Annual Return on the Scottish Social Housing Charter

Consultation questions

We welcome your general feedback on our proposals as well as answers to the specific questions we have raised. You can read our consultation paper on our website at www.housingregulator.gov.scot
Please do not feel you have to answer every question unless you wish to do so.

Send your completed questionnaire to us by **Friday 8 November 2024.**

By email @:   consultations@shr.gov.scot

Or post to: Scottish Housing Regulator
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How you would like your response to be handled
To help make this a transparent process we intend to publish on our website the responses we receive, as we receive them. Please let us know how you would like us to handle your response. If you are responding as an individual, we will not publish your contact details.

Are you happy for your response to be published on our website?

Yes ⊠   **No** ☐

If you are responding as an individual:

Please tell us how you would like your response to be published.	***Pick 1***
Publish my full response, including my name	⊠
Please publish my response, but not my name	☐

1. There are some indicators which we do not routinely use in our regulatory assessment of social landlords' performance. As part of the consultation we are proposing to stop collecting the following indicators **14, 20, 23, 24, C3 and C4.**

   Do you agree with our proposals to remove these indicators?

   > We agree with the proposals to remove indicators 14, 23, 24 and C3.
   >
   > Indicator 20 – We believe that this indicator should remain as the levels of funding received directly impacts on the number of adaptations that can be completed in the year. We fear that if this information is not collected then there will be no awareness of how the costs are being met and this is an area where there are increasing numbers of cases and with the reduction in funding, associations feel the pressure to fund more themselves. We also believe this Indicator could be extended to show the level of works required by splitting into major and minor adaptations, setting an agreed maximum cost for example, £1,000 for minor and anything above this cost would be considered major.
   >
   > Indicator C4 – Abandoned Homes – At present Indicator 22 does not collect data on actual abandoned homes, it only collects data on court and eviction actions. It would be sensible to incorporate C4 into Indicator 22 without the loss of the data.

2. Following feedback from stakeholders we propose to amend the following indicators **10, 15 and C2**.

   Do you agree with our proposals to amend these indicators?

   > Indicator 10 – We do not believe that the rewording of this indicator is helpful in any way. We will still continue to have issues collecting this information. The reworded guidance is misleading and does not give clarity on return visits and there is confusion around return within 12 month period or at year end.
   >
   > Indicator 15 – Locally agreed targets are not comparable across the network which means we would still not have any consistent benchmarking. By measuring the number of cases per 100 homes (self-contained stock only) does this mean all cases of Anti social behaviour reported from clients in non-self-contained stock should not be counted when totalling cases? If so, this is not a true reflection of the caseload. We agree that cases carried over from one year to the next should be included.
   >
   > Indicator C2 – We agree with this amendment.

3. We also propose to introduce an additional indicator to monitor long term voids.

   Do you agree that we should collect an additional indicator in relation to long term voids?

   > We agree that this additional indicator will be of benefit and we would also like to see space to collect the narrative which justifies the reasons why.

4. We propose to collect two new indicators in relation to tenant and resident safety. Do you agree with the additional indicators we propose to collect in relation electrical safety and fire detection?

> We do agree with the collection of the two new indicators for tenant and resident safety.
>
> In regard to electrical safety there are a number of cases where there has been' no access' or failures due to remedial works not being able to be completed due to property condition or hoarding issues , we think there needs to be space for narrative with this indicator to enable some context around reasons for failures to be given.

5. Do you agree with our proposed approach to collect landlords' performance in relation to compliance with tenant and resident safety duties as part of the Annual Assurance Statements?

> Yes, we are surprised that Common Area safety is not part of the data that is being collected especially after Grenfell. We would have thought that Common Area Fire Risk Assessment would be key going forward particularly with communal areas.
>
> This is a difficult area especially with sharing owners reluctant to participate and to finance their share of essential compliance work. Through having this measured and reported on, this would bring a focus and a profile.

6. Issues of damp and mould continue to be an important area of concern for tenants. We therefore propose three new indicators in relation to damp and mould. Do you agree with our proposals to introduce these indicators?

> Yes, we agree that indicators are required, however, how is 'resolved' going to be defined. Is this based on the landlords or tenants opinion.   We do not believe the indicators go far enough.

7. Do you agree with the proposal to collect the "Average length of time taken to resolve cases of damp and/or mould" or would the "median" be more appropriate to measure the time to resolve cases of damp and/or mould?

We believe Median would be more appropriate.

8. Damp and mould is a complex area for landlords. Are the new indicators we propose on damp and mould clearly defined?

Damp and Mould cases are often complex. Some repairs may resolve the issue in one visit, others take a significant number of days and visits to complete. Consider whether there should be a category on cases, priority one – significant issues - multiple visits to resolve, priority two – multiple visits to resolve, priority three – simple resolution one visit resolution or take into consideration the type of damp cases, Rising Damp, Penetrative Damp or Condensation cases, this would demonstrate clearer evidence based problems. This will also give the regulator more awareness of the issues faced by RSL's.

Measurement could then be based on each category rather than as one.

Damp and Mould is exacerbated with many factors including fuel poverty and the cost of living crisis and these are not measureable through the indicators proposed.

Thank you for taking the time to give us your feedback